

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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STEVEN SHADLE	:	
	:	
Plaintiff	:	
	:	No. 4:25-CV-476
v.	:	
	:	(Chief Judge Brann)
PENNSYLVANIA STATE SYSTEM	:	
OF HIGHER EDUCATION;	:	Electronically Filed Document
COMMONWEALTH UNIVERSITY	:	
OF PENNSYLVANIA, TINA	:	<i>Complaint Filed 3/14/25</i>
MAUER, and BELINDA SAUERS	:	
	:	
Defendants	:	

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**DEFENDANTS' MOTION TO DISMISS**

AND NOW, comes Defendants, by and through undersigned counsel, to move pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6), for dismissal of this action for failure to state a claim upon which relief can be granted. As will be identified in the supporting materials, Plaintiff is unable to make out a claim for violations of the Uniformed Services Employment and Reemployment Act, Fourteenth Amendment, 42 U.S.C. § 1985, and Pennsylvania's Veterans' Preference Act.

Respectfully submitted,

DAVID W. SUNDAY, JR.  
Attorney General

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Date: July 15, 2025

By: *s/ Tyler Jefferies*

TYLER JEFFERIES  
Deputy Attorney General  
Attorney ID PA 330225

NICOLE R. DITOMO  
Chief Deputy Attorney General  
Civil Litigation Section

Counsel for Defendants

**CERTIFICATE OF CONCURRENCE**

I, Tyler Jefferies, Deputy Attorney General, hereby certify that I have sought concurrence from Plaintiff's counsel, Jeffrey C. Dohrmann, Esq., and he did not respond to the request for concurrence.

*s/ Tyler Jefferies*  
TYLER JEFFERIES  
*Counsel for Defendants*

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	:	
	:	
Defendants	:	

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**CERTIFICATE OF SERVICE**

I, Tyler Jefferies, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on July 15, 2025, I caused to be served a true and correct copy of the foregoing document titled Defendants' Motion to Dismiss to the following:

VIA ELECTRONIC FILING  
**Jeffrey C. Dohrmann**  
Rieders, Travis, Dohrmann, Mowrey,  
Humphrey & Waters  
161 West Third Street  
Williamsport, PA 17701

s/ Tyler Jefferies  
TYLER JEFFERIES  
Deputy Attorney General